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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORLTAND DIVISION

TYLER MILLER, an individual,

Plaintiff,

vs.

HENRY HEIMULLER, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; BRUCE HOLSEY, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; JEFF FLATT, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; and SHELLEY HENNESSY, in her official capacity as Board Member of the Columbia 9-1-1 Communications District,

Defendants.

Case No. 3:23-cv-00293-SI

DECLARATION OF CLIFFORD S. DAVIDSON IN SUPPORT OF PLAINTIFF'S MOTION TO ENFORCE SUBPOENA

I, Clifford S. Davidson, declare as follows:

1. I am over the age of 18 and am counsel of record for plaintiff Tyler Miller. I make this declaration on personal knowledge. If called upon to do so, I would testify truthfully as follows.
2. Attached hereto as Exhibit 1 is a true and correct copy of the subpoena that I caused to be served on non-party Chandra Egan.
3. Attached hereto as Exhibit 2 are true and correct copies of emails between Ron Downs, who is counsel for Egan, and me.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on September 13, 2023, at Portland, Oregon.

/s/ Clifford S. Davidson
Clifford S. Davidson

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2023, I caused to be served a full and exact copy of the foregoing **DECLARATION OF CLIFFORD S. DAVIDSON IN SUPPORT OF MOTION TO ENFORCE SUBPOENA** on the following:

VIA CM/ECF:

Karen O'Kasey
Hart Wagner LLP
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Attorneys for Defendants

VIA EMAIL AND FIRST CLASS MAIL:

Ron Downs
Special Districts Association
727 Center Street NE, Suite 208
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Attorneys for Non-Party Chandra Egan

Dated: September 13, 2023

s/ Clifford S. Davidson
Clifford S. Davidson, OSB No. 125378

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